Electronic Subcontracting Reporting System (eSRS) Part II

July 2013

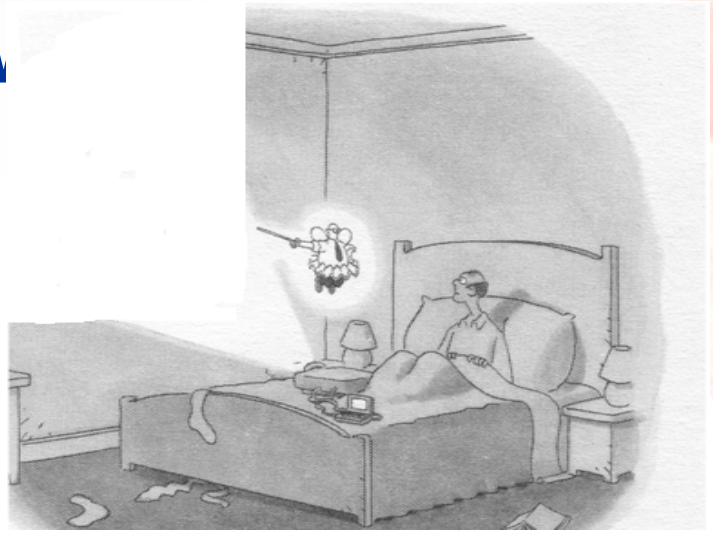
Agenda

Part I

- ✓ **Regulations**
- ✓ **Overview**
- ✓ **Reports in eSRS**

Part II

- ✓ **Guidance for Review eSRS**
- ✓ **Resources**



GUIDANCE FOR REVIEWING INDIVIDUAL SUBCONTRACT REPORT (ISR)

Reviewing ISRs

- Dollars represent all subcontracting from inception of contract to reporting date.
- May show negative $.
- ISR contains data fields, some input by contractor; others “pulled” from sources outside contractor control.
- The awarding contracting office (not administering contracting office) has the responsibility to acknowledge receipt/reject the prime contractor’s

Reviewing ISRs

- Contracting officials registered at the contracting office level will see all ISRs for that office. If registered at the Agency level, then Contracting officials will see all ISRs for the Agency.
- When rejecting an ISR, always provide explanation and clear guidance so contractor knows what to do.

Reviewing ISRs

- When rejecting a previously accepted ISR, consider informing the person who accepted the report, that you are rejecting the report and your reason (so as to ensure reporting accuracy across DoD).
- Contractor can make changes or corrections to previously submitted reports when reviewer either “Reopens” or “Rejects” the report.

Reviewing ISRs

- Prime contractor should have no pending lower-tier ISRs.
- If contractor has pending lower-tier reports, notify contractor that his lower-tier ISRs require action.

NOTE: Contractor may not be aware of pending lower tier ISRs, as they were submitted to incorrect email addresses. Provide contractor email to which lower-tier contractor submitted ISR.

Reviewing ISRs

- If final report, check contract to see if it contains SDB participation targets (FAR 52.219-24). If so, contractor should submit SDB Participation Report (in eSRS) or equivalent.

Reviewing ISRs

- The following slides include a “step by step” review of the ISR.
- The sections refer to and correspond with the sections of the ISR.
- Each section also includes a description of the data.
- Comments provide guidance for the person reviewing the ISR.
- “NAR” means No Action Required.

Item	Section	Description	Comment
A	Contractor Info	Pulled from FPDS	If incorrect: Check CAR in FPDS. Use agency process to correct in FPDS.
B	Contract Info	Pulled from FPDS if available: • Agency Awarding Contract • Contracting Office Agency ID • Contracting Office Agency Name • Contracting Office ID • Contracting Office Name • Funding Agency ID • Funding Office ID • Prime Contract Number • Product or Service Code • Dollars obligated • Current Contract Value	If incorrect: Check CAR in FPDS Use agency process to correct FPDS If eSRS pulling incorrect information from FPDS, inform eSRS Help Desk NOTE: Dollars and values on IDIQ contracts are often incorrect due to data in FPDS.

Item	Section	Description	Comment
C	Contract Admin Office	Contractor is asked if contract is administered by office other than the Contracting Office that awarded the contract. If contractor selects “yes”, he must select Administering Office. Options include “DCMA”, “ONR” and “Other”. If “Other” is selected, contractors can choose from the DoD hierarchy with department or agency, and their organizations.	If Administering Office is incorrect: • REJECT ISR; provide explanation so that contractor knows what to do.
		NOTE: DoD is experiencing problems with eSRS when the awarding and administering offices are different; is addressing with GSA and SBA. Until further notice, do not reject if contractor has not selected correctly.	
D	Contact	Automatically populated based on	No Action

Item	Section	Description	Comment
E	Reporting Period from Inception of Contract Thru	Contractor selects Mar 31 or Sept 30 and the Year from drop-down menu.	If incorrect: • REJECT ISR; provide explanation so that contractor knows what to do.
F	Report Submitted As	Contractor selects “Prime Contractor” or “Subcontractor”.	Note: • Government reviews prime contractors’ ISRs. • Upper-tier contractor reviews its lower-tier contractors’ ISRs.

Item	Section	Description	Comment
G	Type of Report	Contractor selects “Regular” or “Final”.	If incorrect: • REJECT ISR; provide explanation so that contractor knows what to do.
H	Subcontract Awards	Contractor indicates if Indirect Subcontracting Dollars are or are not included.	If not the same as in the Individual Subcontracting Plan: • REJECT ISR; provide explanation so that contractor knows what to do.

Item	Section	Description	Comment
H	Subcontract Awards	• Current Goals (dollar and percent) input by contractor. • System does not calculate percent. • System only validates that dollars for any socioeconomic category cannot be greater than dollars for small business [Line item 1(a)].	If not the same as in the Individual Subcontracting Plan: REJECT ISR; provide explanation so that contractor knows what to do. NOTE: There are no goals for large business, ANC or Indian Tribes.

Item	Section	Description	Comment
(H)	(Subcontract Awards)	• Actual Cumulative dollars input by contractor. • System calculates percent based on Total dollars [Line Item 1(c)]. • System validates that dollars for any socioeconomic category cannot be Greater than the dollars for small business [Line Item 1(a)].	• Dollars in each subsequent report should be equal to or greater than previous report. IF NOT, WHY NOT? Discuss with contractor. NOTE: • Not meeting goals is not a reason to reject ISR. • Contractor may input a negative number • Percent is not based on the total dollars under “Current Goal”.

Item	Section	Description	Comment
I	Which method do you use to collect subcontracting data for this report	Contractor selects one of three options: • “award” • “invoiced” or • “other” (text field)	Contractor should be consistent with whichever option he selects. IF NOT, WHY NOT? Discuss with contractor.
J	Certification	• Contractor certifies data is accurate • Dollars and percents do not include lower-tier subcontracts, except as set forth for ANC and Indian Tribes.	If contractor does not certify: REJECT ISR; provide explanation so that contractor knows what to do.

Item	Section	Description	Comment
K	Remarks	If contractor entered zero in any small business category or failed to meet the dollar or percent goals in the Individual Subcontract Plan, should use this section to explain reason and provide future plan of action or comments which would be helpful to the person reviewing report.	If comment not provided for each category where contractor entered zero or not meeting goal: • REJECT SSR; provide explanation so that contractor knows what to do. NOTE: There are no goals for large business, ANC or Indian Tribes.

Item	Section	Description	Comment
L	Contractor's Subcontracting Plan Administrator	Contractor inputs name and contact information of company employee who is responsible for managing the company's small business program and its subcontracting plans. (Most likely this is be the company's Small Business Liaison Officer -- SBLO.	If contractor does not provide: • REJECT ISR; provide explanation so that contractor knows what to do.

Item	Section	Description	Comment
M	Email Address	Contractor provides email address of Government employee(s) and/or other person(s) to be notified about submitted ISR. NOTE: Notification will be sent to listed parties advising them that an ISR was submitted in eSRS.	NOTE: • Not a mandatory field. Does not mean those notified have responsibility to review the report. • Should not be rejected if contracting official's e-mail address is not included in the report.

GUIDANCE FOR REVIEWING SUMMARY SUBCONTRACT REPORTS (SSR)

REVIEWING SSR FOR INDIVIDUAL SUBCONTRACT PLAN

Reviewing SSRs for Individual Subcontract Plans

- Only the SSR Coordinator for department or agency has responsibility to acknowledge accept of this SSR (most likely DCMA, except for construction, maintenance type contracts).

Changes based on Proposed DFARS Deviation:

- Authority to accept/reject SSR is DoD (OSBP and DPAP) not the SSR Coordinator.

Reviewing SSRs for Individual Subcontract Plan

- Dollars represent all subcontracting performed in the US under DoD prime contracts and subcontracts, regardless of $ value.
- Can be submitted on corporate, company or subdivision basis (i.e. ultimate/parent DUNS).
- Cannot show negative $s.

Reviewing SSRs for Individual Subcontract Plan

- When rejecting an SSR, always provide explanation and clear guidance so contractor knows what to do.
- Contractor can make changes or corrections to previously submitted reports when reviewer either “Reopens” or “Rejects” the report.

Reviewing SSRs for Individual Subcontract Plan

- The following slides include a “step by step” review of the SSR.
- The sections refer to and correspond with the sections of the SSR.
- The data contained in each section is described.
- Comments provide guidance for the person reviewing the SSR.
- “NAR” means No Action Required.

Item	Section	Description	Comment
A	Type of Plan	Contractor selects “Individual Plan” as the type plan which requires him to submit this SSR.	NAR
B	DUNS #	Contractor inputs DUNS # , system auto fills contractor’s physical and mailing addresses	NAR NOTE: DUNS # may not match any DUNS #s on contracts.
C	Date Submitted	Contractor selects date from calendar	NAR

Item	Section	Description	Comment
D	Contact Information	System automatically populates based on registration information.	NAR
E	Reporting Period	Contractor selects “Oct 1 – Mar 31” or “Oct 1 – Sep 30” and the “Year” Per Proposed Deviation: Contractor selects “Oct 1 – Sep 30” and the “Year”	If incorrect: REJECT SSR; provide explanation so that contractor knows what to do. Based on Proposed Deviation: NAR

Item	Section	Description	Comment
F	Agency to Which the Report Is Being Submitted	For DoD non-construction, maintenance-related or repair: Contractor identifies department/agency which administers majority of his subcontracting plans by selecting from 2nd drop-down menu any directly below DoD (Most likely DCMA) Per Proposed Deviation: Contractor submits to DoD.	NOTE: • Contractors are required to submit one SSR per federal agency. • SSR coordinator of the department/agency is responsible for acknowledging receipt or rejecting DoD SSR (Most likely DCMA) If incorrect: REJECT SSR; provide explanation so that contractor knows what to do. Per Proposed Deviation: DoD OSBP and DPAP will coordinate the review.

Item	Section	Description	Comment
(F)	(Agency to Which the Report Is Being Submitted)	For DoD construction, maintenance or repair: Contractor submits separate SSR to each DoD department or agency that awarded prime contracts by selecting from 2nd drop-down menu any directly below DoD Per Proposed Deviation: Contractor submits to DoD.	NOTE: Department or Agency SSR Coordinator is responsible for acknowledging receipt or rejecting the DoD SSR. Per Proposed Deviation: DoD OSBP and DPAP will coordinate the review.

Item	Section	Description	Comment
G	Report Submitted As	Contractor selects: “Prime Contractor”, “Subcontractor”, or “Both”	NAR
H	Contractor’s Major Products or Service Lines	This is a text field. The Contractor must provide at least one major product/service and associated NAICS Code.	NAR

Item	Section	Description	Comment
I	Cumulative Fiscal Year Subcontract Awards	Actual Cumulative dollars are input by contractor; System calculates percent based on total dollars [Line Item 1(c)]; System validates that the dollars for any socioeconomic category cannot be greater than dollars for small business included in Line Item 1(a).	Dollars shown in the second reporting period (Oct 1 – Sep 30) should be ≥ first reporting period (Oct 1 – Mar 31). IF NOT, WHY NOT? Discuss with contractor. Possible reason: Contractor issued a deduct mod to subcontractor for work not required. Per Proposed Deviation, contractor submits annually. NOTE: Contractor may NOT input a negative

Item	Section	Description	Comment
J	Remarks	For any category with zero dollars, contractor provides explanation, future plan of action or any comments which would be helpful to Government official reviewing the report	If comment not provided for each category where zero: • REJECT SSR ; provide explanation so that contractor knows what to do. NOTE: There are no goals for large business, ANC or Indian Tribes.
K	Contractor's Official Who Administers Subcontract Program	Contractor provides name, title and phone number of individual who administers company's Small Business Subcontracting Program (most likely the company's SBLO).	If contractor does not provide: • REJECT SSR; provide explanation so that contractor knows what to do.

Item	Section	Description	Comment
L	Certification	Testament that data in report is accurate; dollars and percentages reported do not include lower tier subcontracts (except as set forth for ANC and Indian Tribes).	If contractor does not certify: • REJECT SSR; provide explanation so that contractor knows what to do.
M	Chief Executive Officer (CEO)	Full name and title of CEO or most Senior Executive of company submitting this report. No delegation of authority is accepted.	NAR, unless you have information indicating otherwise.
N	CEO Approval	Self-certifies that individual listed will sign and keep printed copy of report on file (selects “Yes” or “No”).	If CEO does not certify: REJECT SSR; provide explanation so that contractor knows what to do

Item	Section	Description	Comment
O	Email address of Government Employee(s) and/or Other Person(s) to be Notified That You Have Submitted this Report:	Contractor provides email address of parties to be notified that SSR has been submitted.	Not a mandatory field; does not mean those notified have responsibility to review the report. Should not be rejected if e-mail addresses are not included in the report.

REVIEWING SSR FOR COMMERCIAL SUBCONTRACT PLAN

Reviewing SSRs for Commercial Subcontract Plan

- "Total Dollars" represent all subcontracting performed in the US for entire product line or service for both federal government **and** non-federal government contracts as negotiated in the subcontract plan
- Cannot show negative $s

Reviewing SSRs for Commercial Subcontract Plan

- Contractor must have a government approved Commercial Subcontract Plan and at least 1 prime contract in effect during reporting period
- Companies who indicate they are “Subcontractors Only” cannot have a government approved Commercial Subcontract Plan (need 1 prime contract)

Reviewing SSRs for Commercial Subcontract Plan

- If contractor has subcontracting with multiple government agencies, the contractor must:
  - Identify Federal agencies and indicate % of total dollars attributable to each
  - Identify the Federal agency's contracting organization which approved the Commercial Subcontract Plan
  - NOTE: DCMA does not approve Commercial Subcontract Plans

Reviewing SSRs for Commercial Subcontract Plan

- Contracting official who approved Commercial Plan is responsible for approving SSR
- When rejecting a previously accepted SSR, consider informing the person who accepted the report that you are rejecting the report and your reason (to ensure reporting accuracy across DoD)

Reviewing SSRs for Commercial Subcontract Plan

- When rejecting an SSR, always provide explanation and clear guidance so contractor knows what to do
- Contractor can make changes or corrections to previously submitted reports when reviewer either “Reopens” or “Rejects” the report

Reviewing SSRs for Commercial Subcontract Plan

- The following slides include a “step by step” review of the SSR
- The sections refer to and correspond with the sections of the SSR
- The data contained in each section is described
- Comments provide guidance for the person reviewing the SSR
- “NAR” means No Action Required

Item	Section	Description	Comment
A	Type of Plan	Contractor selects “Commercial Plan” as the type of subcontracting plan which requires him to submit this SSR.	NAR
B	DUNS #	Contractor inputs DUNS #, which auto fills contractor’s physical and mailing addresses.	NAR
C	Date Submitted	Contractor selects date from calendar.	NAR
D	Contact Info	System automatically populates based on contractor’s registration information.	NAR

Item	Section	Description	Comment
E	Reporting Period	Contractor selects the reporting period (1 Oct-30 Sep) and selects the year from a drop-down menu.	No Action Required

Item	Section	Description	Comment
F	Report Submitted As	Contractor selects “Prime Contractor” “Subcon-tractor” or “Both”.	If the contractor selects “Subcontractor”: • REJECT SSR; provide explanation so that contractor knows what to do. NOTE: A contractor must have at least 1 prime contract to have a Commercial Subcontract Plan approved by a Contracting Official. Vendors , who are only subcontractors, do not have a Commercial Subcontract Plan. However, eSRS allows a vendor to indicate he is a subcontractor with a Commercial Plan when submitting the SSR.

Item	Section	Description	Comment
G	Major Products or Service Lines	This is a text field. The contractor must provide at least one major product or service and the associated NAICS Code.	If contractor indicates construction and related maintenance repair type work or uses NAICS Sector 23xxxx • REJECT SSR; provide explanation so contractor knows what to do. NOTE: Commercial Plan is not appropriate for construction and maintenance type contracts; contractor inadvertently selected “Commercial Plan” (should have selected “Individual Plan”). Contractor relates this plan to renovation/maintenance of commercial properties .

Item	Section	Description	Comment
H	Cumulative Fiscal Year Subcontract Awards	Actual Cumulative dollars input by contractor; System calculates percent based on total dollars [Line Item 1c); System validates that the dollars for any socioeconomic category cannot be greater than the dollars for small business in Line Item 1(a).	If total represents subcontracting dollars spent exclusively (100%) on government contracts: REJECT SSR; provide explanation so that contractor knows what to do. NOTE: Dollars represent total amount of subcontract awards spent for the items/services under the approved Commercial Subcontract Plan; subcontracting in the US for Federal government **and** non-federal government business, (local, national and

Item	Section	Description	Comment
I	Specify Agencies to Which You are Submitting this Report and Percentages of Dollars Attributable to each	Percent represents % of subcontracting attributable to each federal government agency.	If 100% for: • Federal government as a whole; • Any single government agency; • Or any combination thereof. REJECT SSR; provide explanation so that contractor knows what to do. NOTE: Includes subcontracting in the US for Federal government **and** non-federal government business, (local, national and international) rather than solely to federal government.

Item	Section	Description	Comment
(I)	(Specify Agencies to Which You are Submitting this Report and Percentages of Dollars Attributable to each)		NOTE: • Any percent between 50% and 99% is suspect. • Portion of subcontracting $ for the federal government should be quite small in comparison to the overall subcontracting $ (on the entire product line or service) and even smaller to a specific federal agency. • However, this is just a good guideline to follow and not set in stone. • Contact and verify with the contractor.

Item	Section	Description	Comment
J	Approver	Contractor identifies agency contracting office which approved Commercial Subcontract Plan	If your contracting office is not the approver of the Commercial Subcontract Plan: • REJECT SSR and provide explanation so that contractor knows what to do.

Item	Section	Description	Comment
K	Approver		NOTE: • If you are the approver of the Commercial Subcontract Plan, send an email to agencies listed with % attributable, ask for their feedback. • The approver of the plan must be registered at same organization or office level identified in SSR in order to “see” the report.

Item	Section	Description	Comment
L	Remarks	For any category with zero dollars, contractor provides explanation, future plan of action or any comments which would be helpful to Government official reviewing the report	If comment not provided for each category where zero: • REJECT SSR ; provide explanation so that contractor knows what to do. NOTE: There are no goals for large business, ANC or Indian Tribes.
M	Contractor's Official Who Administers Subcontract Program	Contractor provides name, title and phone number of individual who administers company's Small Business Subcontracting Program (most likely the company's SBLO).	If contractor does not provide: • REJECT SSR; provide explanation so that contractor knows what to do.

Item	Section	Description	Comment
N	Certification	Testament that data in report is accurate; dollars and percentages reported do not include lower tier subcontracts (except as set forth for ANC and Indian Tribes).	If contractor does not certify: • REJECT SSR; provide explanation so that contractor knows what to do.
O	Chief Executive Officer (CEO)	Full name and title of CEO or most Senior Executive of company submitting this report. No delegation of authority is accepted.	NAR, unless you have information indicating otherwise.
P	CEO Approval	Self-certifies that individual listed will sign and keep printed copy of report on file (selects “Yes” or “No”).	If CEO does not certify: REJECT SSR; provide explanation so that contractor knows what to do

Item	Section	Description	Comment
Q	Email address of Government Employee(s) and/or Other Person(s) to be Notified That You Have Submitted this Report:	Contractor provides email address of parties to be notified that SSR has been submitted.	• Not a mandatory field; does not mean those notified have responsibility to review the report. • Should not be rejected if e-mail addresses are not included in the report.

REVIEWING SSR FOR DOD COMPREHENSIVE SUBCONTRACT PLAN (CSP)

Reviewing SSRs for DoD

- DCMA-CSP Division responsible for reviewing SSR under CSP
- Submitted Semi-annually (30 Apr & 30 Oct)
- Contains subcontracting dollars under prime contracts and subcontracts under CSP
- SSR for CSP is same as SSR for Individual Subcontract Plan, except
  - May include subcontracting $ for departments/agencies or DoD programs

REVIEWING YEAR-END SDB REPORT

Year-End Supplementary Report for SDB

- Accompanies year-end SSR
- Includes subcontract $ to SDBs by NAICS Industry Subsectors
- SSR Coordinator who reviewed the SSR is also responsible for reviewing the Year-End Supplementary Report for SDB

Proposed FAR/DFARS Deviation

- Authority to accept/reject SSR is DoD (OSBP/DPAP)

SDB PARTICIPATION REPORT

SDB Participation Report

- No guidance is provided for reviewing as this report is only required under FAR 52.219-24 and not under FAR 52.219-9

RESOURCES

Resources

- http://www.acq.osd.mil/osbp/
  - "Tips for DoD Contractors Submitting Subcontracting Reports (Aug 2012)"
  - "DoD Subcontracting Program: The Basics (Aug 2012)
- "DoD Guidance on Business Processes for eSRS and Related Subcontracting Reports"
- OSBPInfo@osd.mil (questions and comments)
- http://www/acq.osd.mil/dpap/